

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
SHERRY LYNN YOUNG :
Debtor : CHAPTER 13
:
JACK N. ZAHAROPOULOS :
STANDING CHAPTER 13 TRUSTEE :
Movant : CASE NO. 1-24-bk-03162
:
SHERRY LYNN YOUNG :
Respondent :
:

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 7th day of February 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

3. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:

- a. Debtor(s) has not provided to Trustee pay stubs for the month(s) of December 2025 and January 2025 for the Administrative Assistant job.
- b. Debtor(s) has not provided to Trustee a six (6) month Profit and Loss Statement.

2. Trustee provides notice to the Court as to the ineffectiveness of Debtor(s)' Chapter 13 Plan for the following reasons:

- a. Clarification of vesting property. Because non-exempt equity exists, the Plan should provide for vesting at closing or discharge. Accordingly, the Plan violates §1325(a)(4).

3. The Plan has not been served as required by LR 3015-1(b) as to the creditors listed in Paragraphs 2E and 2G of the Plan. Specifically, Hyundai Motor Finance must be served pursuant to Rule 7004.

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WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s)' Plan.
- b. Dismiss or convert Debtor(s)' case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 7th day of February 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the Unites States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

JOSEPH QUINN, ESQUIRE
192 SOUTH HANOVER STREET
SUITE 101
POTTSTOWN, PA 19464-6096

/s/Tammy Life

Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee